

MWM FINANCIAL GROUP PRIVACY POLICY

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In accordance with current federal privacy legislation, MWM FINANCIAL GROUP has adopted new privacy practices to protect customer information. MWM FINANCIAL GROUP is committed to protecting the privacy of our customers and regard this as an integral part of the service we provide you. Each MWM FINANCIAL GROUP employee is responsible for ensuring the confidentiality of all personal information they may access. In addition, every employee signs a confidentiality agreement as a condition of employment, which includes provisions on the protection of personal information.

PERSONAL INFORMATION

Personal information refers to information that identifies you. It may include information such as your age, marital status, employment history, social insurance number, credit history, home address, personal e-mail address and home telephone number.

Why do we need your Personal Information?

We require your personal information in order to establish a relationship with you and provide you with the best possible service - the better we know you, the better we can serve you. Your signature, financial history, current financial position, social insurance number, age and other similar personal information allow us to:

- Establish your identity;
- Understand and assess your eligibility for our products and services;
- Protect you and us from error and fraud; and
- Comply with the law.

How do we obtain your personal information?

Personal information is obtained primarily from you, although we may also obtain information from other sources with your consent. These other sources may include, but are not limited to, your advisor or dealer, other MWM FINANCIAL GROUP affiliates, credit bureaus, other financial institutions, etc.

How do we use your personal information?

We may use your personal information for the following purposes:

- To identify you;
- To ensure our records are accurate;
- To establish and administer your account;
- To execute your transactions;
- To maintain, store, record and determine your account holdings and transaction records;
- To verify previously given information when necessary;
- To provide you and your representatives with account statements/information;
- To provide you with financial statements, tax receipts, proxy mailings, transaction confirmations and other information that may be requested or needed to service your account;
- To provide you with quality customer service and support on your investment needs;

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- To protect the interests of MWM FINANCIAL GROUP, such as the collection of a debt owed; and
- To meet legal and regulatory requirements.

Who do we disclose your personal information to?

Your personal information will only be used for stated purposes to assist us in providing you with the best possible service. MWM FINANCIAL GROUP may also provide your personal information to other third parties. This is done only to meet your service requirements. Third parties that may be provided with your personal information include:

- Your financial representative;
- Other financial institutions, securities dealers and mutual fund companies;
- Other MWM FINANCIAL GROUP affiliates;
- Contracted third-party service providers;
- Canadian governments, government agencies and regulators; and
- Any other legally required institutions.
- Disclosing your personal information when required or permitted by law:
- MWM FINANCIAL GROUP may be required to provide your personal information in response to a search warrant, court order or other legally valid request. We may also disclose your personal information to help us collect a debt owed by you.

OBTAINING YOUR CONSENT

Before you open an account with MWM FINANCIAL GROUP you will be required to provide certain personal information. In addition, you will be asked to provide your verbal or written consent when you give personal information. MWM FINANCIAL GROUP will not use this information without first obtaining your consent, and will only use it for the purposes stated at the time of collection.

Withdrawing your consent:

You may withdraw your consent for the use of your personal information by contacting MWM FINANCIAL GROUP at any time. Legal and other requirements may prevent you from withdrawing consent and your decision to withdraw personal information may also limit the services or products MWM FINANCIAL GROUP is able to provide to you.

Access to and accuracy of your personal information:

Upon request MWM FINANCIAL GROUP will provide you with access to your personal information. In addition, MWM FINANCIAL GROUP may provide you with a list of third parties to whom your personal information was provided. If you wish to change or update your personal information, you may request to do so at any time. Please note that MWM FINANCIAL GROUP may only alter that personal information required to fulfill the stated purposes.

In certain circumstances MWM FINANCIAL GROUP may not be able to provide you with access to specific pieces of information. For example: (i) information containing references to other persons (ii) information containing propriety information confidential to MWM FINANCIAL GROUP or its affiliates (iii) information that has been destroyed or (iv) information that is too costly to retrieve.

Where is your personal information kept?

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Your personal information may be kept in electronic or paper format in the offices of MWM FINANCIAL GROUP, its affiliates or its third-party service providers.

Protecting Your Information

Policies, procedures, guidelines, and safeguards have been put in place at MWM FINANCIAL GROUP to ensure your personal information is protected.

Our employees and service providers have access to your personal information to enable them to perform their duties in servicing you.

Any personal information collected from you will only be used for the purposes identified at the time of collecting the information and will be retained for as long as is necessary to fulfill the service, or as required by law.

Security measures including passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your information against unauthorized access, modification, loss, theft or general misuse.

COMPLAINTS

MWM FINANCIAL GROUP is committed to treating you with respect and consideration in all dealings. From time to time however, a misunderstanding or error may occur regarding matters of privacy. In such circumstances, MWM FINANCIAL GROUP will act diligently to resolve the problem.

Resolving your complaints:

Should you have a complaint, please contact our office at:

MWM FINANCIAL GROUP
Attn: Privacy of Information
181 Frederick Street
Kitchener, ON
N2H 2M6
Phone: 519-569-7800
Fax: 519-569-7264
Email: info@mwmgroup.com

MWM FINANCIAL GROUP will respond to your complaint in a timely fashion. Should you find that the proposed solution is unacceptable, you may contact the following institutions:

Investment Funds Institute of Canada

151 Yonge Street, 5th Floor
Toronto, Ontario M5C 2W7
Phone: 416-363-2158

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The Privacy Commission of Canada

112 Kent Street

Ottawa, Ontario K1A 1H3

Phone: 613-995-8210 or 1-800-282-1376

Or in Quebec:

The Commission d'accès à l'information

575, rue St. Amable, Bureau 1.10

Québec, Québec G1R 2G4

Phone: 418-528-7741 or 1-888-528-7741